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HONORABLE MARY JO HESTON
HEARING DATE: May 16, 2019
TIME: 1:00 pm
RESPONSE DATE: May 9, 2019
Chapter 13
Tacoma, WA

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT COURT OF WASHINGTON**

Re

**JENIFER LEE CAREY
MARIO D. CAREY**

Debtor(s)

**In Chapter 13 Proceeding
No. 18-40496-MJH**

**RESPONSE TO MOTION FOR RELIEF
FROM STAY: AMERICA'S CREDIT UNION**

COMES NOW the above-referenced debtor(s) through their attorneys of record and states:

1. Debtors will be selling their home and paying off the bankruptcy in full.

Debtors will be listing their home next Wednesday and are pricing the home very competitively. Debtors' neighbors sold a similar floor plan and listed their home and sold it in three days for a similar price.

2. Debtors ask that this motion be continued to the June 25, 2019 calendar so that it will stay on the docket but Debtors will have time to effectuate a sale.

3. America's Credit Union will be paid in full from the proceeds of the sale.

Therefore, Debtor requests that the Motion for Relief from Stay be denied or continued to the June 25, 2019 calendar while the Debtors sale their home.

Dated May 9, 2019

/s/ Ellen Ann Brown

ELLEN ANN BROWN WSB#27992
Attorneys for Debtor(s)